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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

IN RE AMERICAN EXPRESS ANTI-STEERING RULES ANTITRUST LITIGATION (II)	Master File No: 11-MD-2221 (NGG) (RER)
<p>This Document Relates to:</p> <p><i>Rite Aid Corporation, et al. v. American Express Travel Related Services Co., Inc.</i>, Case No: 08-cv-2315-NGG-RER</p> <p><i>CVS Pharmacy, Inc. v. American Express Travel Related Services Co., Inc.</i>, Case No: 08-cv-02316-NGG-RER</p> <p><i>Walgreen Co. v. American Express Travel Related Services Co., Inc.</i>, Case No: 08-cv-2317-NGG-RER</p> <p><i>BI-LO, LLC v. American Express Travel Related Services Co., Inc.</i>, Case No: 08-cv-02380-NGG-RER</p> <p><i>H.E. Butt Grocery Co. v. American Express Travel Related Services Co. Inc.</i>, Case No: 08-cv-02406-NGG-RER</p> <p><i>The Kroger Co., Safeway, Inc., Ahold USA, Inc., Albertson's LLC, Hy-Vee, Inc., The Great Atlantic &amp; Pacific Tea Company, Inc. v. American Express Travel Related Services Co., Inc.</i>, Case No: 11-cv-0337-NGG-RER</p> <p><i>Meijer, Inc., Publix Super Markets, Inc., Raley's, and Supervalu v. American Express Travel Related Services Co., Inc.</i>, Case No: 11-cv-0338-NGG-RER</p>	

**PROPOSED PRETRIAL SCHEDULE**

<b><u>Pre-Trial Event</u></b>	<b><u>Deadline</u></b>
Parties exchange initial deposition designations	January 18, 2019
American Express' additional expert reports due	February 1, 2019
Parties exchange trial witness lists	March 1, 2019
Parties exchange deposition counter-designations and objections to initial deposition designations	March 1, 2019
Parties exchange trial exhibit lists	March 8, 2019
Parties exchange draft statements of undisputed facts relevant to their respective claims and defenses	March 15, 2019
Parties exchange proposed voir dire, jury instructions, and verdict sheets	March 15, 2019
Plaintiffs' additional reply expert reports due	March 29, 2019
Parties exchange any supplemental exhibit and witness lists	April 5, 2019
Parties exchange responsive deposition designations and objections to counter-designations	April 12, 2019
Expert depositions complete	April 19, 2019
Each party designating trial exhibits or deposition testimony that a non-party designated as confidential shall give notice to the non-party that the materials may be publicly disclosed at trial	April 19, 2019
<i>Daubert</i> Motions and Motions <i>in Limine</i> Due	April 26, 2019
Parties conclude meet and confer discussions regarding voir dire, jury instructions, and verdict sheet(s)	May 3, 2019
Parties exchange proposed edits, in redline, to statement of undisputed facts for pre-trial order	May 3, 2019
Parties exchange objections to trial exhibit lists	May 3, 2019

Parties exchange proposed stipulations regarding admissibility of trial exhibits	May 10, 2019
Parties conclude meet and confer regarding proposed stipulations of fact for pre-trial order	May 10, 2019
Any party or non-party must file any motions objecting to public disclosure at trial of any trial exhibits or designated deposition testimony (or, must file any stipulations and proposed orders regarding such materials)	May 10, 2019
Responses to Motions <i>in Limine</i> Due	May 17, 2019
Parties submit to Court a joint submission of the parties' proposed voir dire, jury instructions, and verdict sheet(s)	May 21, 2019
Parties File Pretrial Memoranda and Joint Pretrial Order	May 21, 2019
Oppositions to <i>Daubert</i> motions due	May 24, 2019
Parties file any oppositions to motions concerning public disclosure of exhibits and deposition testimony	May 31, 2019
Oral argument on <i>Daubert</i> and/or Motions <i>in Limine</i>	TBD
Final Pretrial Conference	TBD
Final Trial Exhibits Exchanged	TBD
Jury Selection and Trial Begin	June 10, 2019*

\* Subject to confirmation with the parties and the Court.

SO ORDERED:

Dated: December 12, 2018

s/Nicholas G. Garaufis

Honorable Nicholas G. Garaufis  
United States District Judge